

KATRYNA LYN SPEARMAN Ga. # 616038

Pro Hac Vice Counsel

Lowther | Walker LLC

101 Marietta St. NW, Suite 3650

Atlanta, Georgia 30303

Telephone: (404) 496-4052

Email: KSpearman@LowtherWalker.com

LEIGHTON K. LEE #2975

Local Counsel

Law Offices of Leighton K. Lee

222 Merchant Street, Suite 201

Honolulu, Hawaii 96813

Telephone: (808) 532-3244

Email: Leighton@HawaiiLaw.org

Attorneys for Defendant

RICHARD PATTERSON

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RICHARD PATTERSON,

a/k/a "Xavier Carter,"

(01)

Defendant.

CR. NO. 21-00111 DKW

PARTIES' CONCISE STATEMENT
OF THE CASE; CERTIFICATE OF
SERVICE

TRIAL

DATE: Jan. 10, 2025

TIME: 10:00 a.m.

JUDGE: Honorable Derrick K.
Watson

MOTION TO WITHDRAW AS ATTORNEYS OF RECORD

Ms. KATRYNA LYN SPEARMAN, Esq., and Mr. LEIGHTON K. LEE, Esq., by association as local counsel only, pursuant to D. Haw. L. R. 83.5, and Haw. R. Prof. Cond. 1.16, respectfully move this Court to allow them to withdraw as attorneys of record for Mr. Richard Patterson, a defendant in the above-styled case.

On August 19, 2021, the Government brought formal charges against Mr. Patterson. (Indict., ECF No. 1.) On or about August 13, 2022, Mr. Patterson renewed his desire to work with Lowther | Walker LLC and retained undersigned counsel—who immediately moved for admission *pro hac vice* through local counsel-- for representation in the instant criminal matter. (Mot., ECF No. 39.) On October 11, 2024, Ms. Spearman and Mr. Lee filed a Motion to Withdraw. (ECF No. 95.) On October 15, 2024, this Court ordered that the Motion to Withdraw be held in abeyance. (Order, ECF No. 110.) On October 21, 2024, this Court denied Ms. Spearman and Mr. Lee's request to withdraw due to Mr. Patterson's non-appearance. (Order, ECF No. 120.) On November 4, 2024, Mr. Patterson was arrested. (Dkt. Entry, Nov. 4, 2024.)

Since Ms. Spearman and Mr. Lee's previous motion to withdraw, communications with Mr. Patterson have continued to deteriorate. Mr. Patterson has since engaged with the "Walkernova Group" to represent him, who, invoking

the name of “Richard Patterson, the living man,” continually threatens undersigned counsel with a forty-billion-dollar lawsuit, claiming the following, among other ludicrous allegations:

- That undersigned counsel has “sold out” Mr. Patterson to the U.S. Government.
- That undersigned counsel has committed treason and is warring against the Constitution.
- That undersigned counsel’s assistance is ineffective.
- That if undersigned counsel fails to “do the right thing, this will become a very very very big public matter.”

See Exhibit A.

The communications sent from the Walkernova Group are incessant, factually baseless, and, speaking frankly, reflect the ramblings of a deeply disturbed person or persons. Mr. Patterson has hired this group ostensibly to communicate with undersigned counsel, as Mr. Patterson himself refuses to do so. While Ms. Spearman has attempted to cooperate with the Walkernova Group to the best of her ability, they have only responded with outlandish threats.

District of Hawai’i Local Rule 83.5 states, in its pertinent part, that “[a]n attorney who has appeared in a case may seek to withdraw on motion showing good cause.” D. Haw. L. R. 83.5(b).

Furthermore, the Hawai’i Rules of Professional Conduct state that where representation has commenced, “a lawyer may withdraw from representing a client if ... other good cause for withdrawal exists.” Haw. R. Prof. Cond. 1.16(b)(7).

Here, Mr. Patterson refuses to communicate with undersigned counsel and has hired an entity that continually threatens her. Furthermore, because the entity that Mr. Patterson has hired repeatedly accuses her of ineffective assistance of counsel, there is now a direct conflict of interest in the case.

Ms. Spearman respectfully submits that because Mr. Patterson refuses to speak with her, has hired an entity that harasses her, and has asserted ineffective assistance of counsel, no hearing is required to rule on this motion to withdraw. However, should the Court require a hearing on this motion, Ms. Spearman respectfully requests to appear virtually, as appearing in person when her client refuses to speak with her would be an undue financial burden on Ms. Spearman, who resides on the mainland.

Therefore, Ms. Spearman and Mr. Lee respectfully request that this Court grant them leave to withdraw as attorneys of record for Mr. Patterson.

DATED: October 11, 2024, at Atlanta, Georgia.

By: /s/ Katryna Lyn Spearman
KATRYNA LYN SPEARMAN
Attorney for Defendant (01)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 21-00111 DKW
)	
Plaintiff,)	D. HAW. L. R. 83.5(b)
)	CERTIFICATION
vs.)	
)	
RICHARD PATTERSON,)	
a/k/a "Xavier Carter,")	
(01))	
)	
Defendant.)	
)	
)	

NOTICE TO MR. PATTERSON

Pursuant to D. Haw. L. R. 83.5.(b), to the best of undersigned counsel's knowledge, Mr. Richard Patterson may be contacted on his mobile phone +1 (424) 428-7062 and via email at EPEPartners@yahoo.com. Mr. Patterson's collaborators, the Walkernova Group, can be reached at team@walkernovagroup.com. Undersigned counsel does not have a current physical or mailing address for Mr. Patterson.

Undersigned counsel further respectfully notifies Mr. Patterson a **warning that should the instant Motion to Withdraw be granted, Mr. Patterson will personally be responsible for complying with all court orders and time limitations established by any applicable rules including but not limited to the**

Pretrial Conference and Trial currently scheduled for October 21 and 28, 2024, respectively.

DATED: December 20, 2024, Atlanta, Georgia.

/s/ Katryna Spearman
Attorney for Defendant (01)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 21-00111 DKW
)	
Plaintiff,)	CERTIFICATE OF SERVICE
)	
vs.)	
)	
RICHARD PATTERSON,)	
a/k/a "Xavier Carter,")	
(01))	
)	
Defendant.)	
)	
)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on the dates and by the methods of service noted below, a true and correct copy of the foregoing document was served on the following at their last known addresses:

Served Electronically through CM/ECF:

William Shipley	808shipleylaw@gmail.com
Andrew Kennedy	andrew@kona-lawyer.com
Michael Albanese	michael.albanese@usdoj.gov

Served Electronically through E-Mail:

Richard Patterson	epepartners@yahoo.com
-------------------	-----------------------

DATED: December 20, 2024, Atlanta, Georgia.

/s/ Katryna Spearman
Attorney for Defendant (01)